

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO: <i>Raquel De la Torre v. Ethicon, Inc., et al.</i> Case No. 2:12-cv-00751	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**NOTICE OF VIDEO DEPOSITION OF
SONDRA BENAY LEE, M.D.**

To: Dr. Sondra Benay Lee
Kaiser Permanente Obstetrics & Gynecology
44105 15th Street, Suite 406
Lancaster, CA 93534

Notice is hereby given pursuant to Rule 30 of the Federal Rules of Civil Procedure that Plaintiffs will take the video deposition upon oral examination of Dr. Sondra Benay Lee on Wednesday, September 23, 2015 at 10 a.m., at Kristensen Weisberg, LLP, 12304 Santa Monica Boulevard, Suite 100, Los Angeles, California, 90025. This deposition is being taken for the purposes of discovery and such other purposes as authorized by law. The deposition will be taken before a person authorized by law to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and shall continue from day to day until completed. The Deponent is asked to bring to the deposition the documents as described in Exhibit A regarding the above referenced case.

Date: August 25, 2015

By: /s/ John P. Kristensen
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Attorneys for Plaintiff

EXHIBIT A

1. A copy of your current Curriculum Vitae.
2. Your complete medical records regarding the plaintiff.
3. All documents currently in your possession, custody or control, including but not limited to, brochures, training materials, videos, and any communications, including emails, memoranda, and/or letters, received from or sent to Johnson & Johnson (“J&J”), Ethicon, Inc. (“Ethicon”) or any other J&J company, or any of its representatives or employees concerning pelvic mesh products.
4. All documents evidencing any financial relationship, if any, between you and J&J, Ethicon or any other J&J company, including but not limited to, any consulting agreements, agreements to research or otherwise study any J&J or Ethicon pelvic mesh product, and/or contracts, monetary and/or non-monetary benefits, including but not limited to money, travel, and device samples, provided to you by J&J or Ethicon, and/or any of its agents, including amounts, dates, and purpose.
5. A copy of any brochures, documents or other materials you provided to plaintiff regarding pelvic mesh products or procedures or that you routinely provided to patients regarding pelvic mesh products or procedures.
6. All protocols related to the preservation of explanted products and/or tissue specimens that were in effect at Antelope Valley Hospital on or around April 28, 2010.

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ John P. Kristensen
John P. Kristensen